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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

ProtectMarriage.com, et al.,

Plaintiffs,

vs.

Debra Bowen, et al.,

Defendants.

Case No. 2:09-CV-00058-MCE-DAD

**DEFENDANTS' RESPONSE TO PLAINTIFFS'
OBJECTIONS TO THE SECOND AMENDED
PRE-TRIAL SCHEDULING ORDER**

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1 Defendants Debra Bowen, Secretary of State for the State of California, in her official
2 capacity; Edmund G. Brown, Jr., Attorney General for the State of California, in his official capacity;
3 Department of Elections - City and County of San Francisco; Dennis J. Herrera, City Attorney for the
4 City and County of San Francisco, California, in his official capacity and as a representative of the
5 Class of Elected City Attorneys in the State of California; Dan Schnur, Timothy Hodson, Elizabeth
6 Garrett, Lynn Montgomery, and Ronald Rotunda, members of the California Fair Political Practices
7 Commission, in their official capacities ("Defendants") write in response to Plaintiffs' Objections to
8 the Court's Second Amended Pre-trial Scheduling Order (Doc. 228).

9 Defendants have no objections to the Court's Second Amended Pre-trial Scheduling Order
10 (Doc. 225) and believe that it provides an appropriate amount of time for the parties to complete
11 discovery. If, however, the Court determines there is good cause to modify the scheduling order,
12 Defendants respectfully request that the deadline for completion of non-expert discovery be set at least
13 sixty days out from the date of any modified order. Plaintiffs have not yet produced the further
14 discovery responses ordered by Judge Drozd (*see* Doc. 227), and Defendants do not share Plaintiffs'
15 confidence that discovery is on track to be completed by July 13, 2010 (*see* Doc. 228 at 3). Therefore,
16 Defendants respectfully request that if the Court modifies its Order, any revised deadlines provide at
17 least sixty days from the issuance of the Order for the parties to attempt to complete discovery.

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19 Dated: June 17, 2010

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23
24 By /s/
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